

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEPHANIE LYNN FORD,)
)
)
Plaintiff,)
) Civil Action No. 05-105 (KAJ)
)
V.)
)
UNUM LIFE INSURANCE COMPANY)
OF AMERICA,)
)
)
Defendant.)

**PLAINTIFF, ANSWERING BRIEF
OPPOSING DEFENDANT MOTION TO DISMISS**

Dated: May 9, 2005

Plaintiff, Stephanie Lynn Ford
Pro-Se
19 Albany Ave.
Newcastle ,De. 19720

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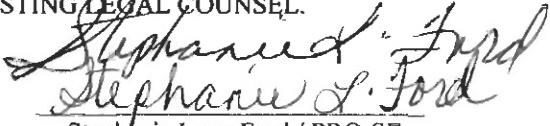
1. Plaintiff is a citizen of the State of Delaware, residing at 19 Albany Ave. Newcastle, De. 19720
2. Plaintiff, previously employed at Christiana Care Health Systems, P.O. BOX 2653 Wilmington, De. 19805. Date of Hire August 24, 1987 To October 28, 2003.
3. Defendant is a citizen of the State of Delaware, 1105 North Market Street 7th Floor Wilmington, Delaware 19801
4. Defendant, Unum Life Insurance Company of America , Long Term Disability policy holder.
5. In response to the motion Civil Action NO. 05-105, This case should not be dismiss for Civil Rights Violations.
6. This case should not be Dismiss , because, while The Plaintiff STEPHANIE LYNN FORD Under the DOCTOR'S CARE, I filed for LONG TERM DISABILITY, and was DENIED As a result I loss my job.
7. This case should not be Dismiss because, When I The Plaintiff provided the Defendant Unum Life Insurance Company Of America with the appropriate documentation to Support my Disability , (I HAVE BEEN PAYING FOR THIS LONG TERM DISABILITY SERVICE FOR MANY YEARS), Yes it is a violation of my rights , I have fulfilled my end Of the contract and appealed the claim and it was denied.

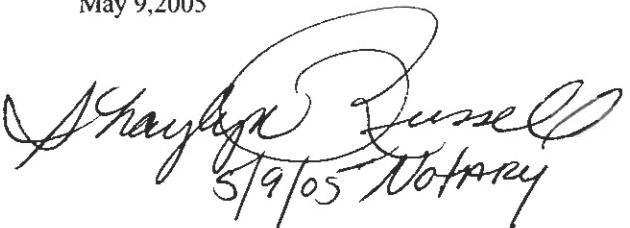
8. The Defendant Unum Life Insurance Company Of America left no me other choice
HONORABLE KENT A. JORDAN , but to file this case before you , so that JUSTICE
CAN BE SERVE.
9. HONORABLE KENT A. JORDAN, I THE PLAINTIFF STEPHANIE LYNN FORD
AM REQUESTING YOU TO REVIEW THE CONTRACT TO ACCESS, IF THIS
CASE IS A BREACH OF CONTRACT OR A ERISA VIOLATION.
10. THE PLAINTIFF , STEPHANIE LYNN FORD AM REQUESTING A COMPLETE
COPY OF MY LONG TERM DISABILITY CONTRACT FROM THE DEFENDANT
UNUM LIFE INSURANCE COMPANY OF AMERICA.
11. THE PLAINTIFF , I STEPHANIE LYNN FORD AM REQUESTING LEGAL COUNSEL.

CC; HONORABLE KENT A. JORDAN
UNITED STATES DISTRICT JUDGE

Mr. Walter P. McEvilly , Jr
Steven & Lee

PF: Stephanie Lynn Ford


Stephanie Lynn Ford / PRO-SE
19 Albany Ave.
Newcastle , De. 19720
(302) 658-6740
May 9,2005


Shayla Russell
5/9/05 Notary